

## BROWN & CONNERY, LLP

ATTORNEYS AT LAW  
360 HADDON AVENUE  
WESTMONT, NEW JERSEY 08108  
(856) 854-8900  
FAX (856) 858-4967

Kathleen E. Dohn, Esq.  
[kdohn@brownconnery.com](mailto:kdohn@brownconnery.com)

October 5, 2023

**Via Electronic Filing**

Honorable Leda Dunn Wettre, U.S.M.J  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.**  
**Docket No.: 2:17-cv-13111-SDW-LDW**

Dear Judge Wettre:

Pursuant to Your Honor's judicial preferences, Defendants hereby request leave to file a Motion for Summary Judgment seeking dismissal of each of the Plaintiff's remaining claims pursuant to Federal Rule of Civil Procedure 56 (hereinafter "Motion"). All discovery is complete with the exception of the depositions of Plaintiff's treating physicians, which pertain only to damages and will have no bearing on Defendants' Motion. As the issues to be raised in Defendants' Motion are ripe for consideration, Defendants' request leave to file their Motion at this time. Defendants' Motion will argue that summary judgment should be granted as a matter of law on all remaining counts and there are no genuine issues of material fact that preclude summary judgment.

Please do not hesitate to have your chambers contact me with any questions or concerns.

Respectfully submitted,  
**BROWN & CONNERY, LLP**  
*s/ Kathleen E. Dohn*  
Kathleen E. Dohn

cc: Ralph Ferrara, Esquire (*via electronic mail*)  
Kevin Kotch, Esquire (*via electronic mail*)  
William Tambussi, Esquire (*via electronic mail*)  
Kayla Louis, Esquire (*via electronic mail*)